

All responses are to be served upon:

Katherine Phillips  
Kirkland & Ellis LLP  
200 East Randolph Drive  
Chicago, IL 60601

-and-

James E. O'Neill  
Pachulski, Stang, Ziehl, Young, Jones & Weintraub P.C.  
919 North Market Street, 16th Floor, P.O. Box 8705  
Wilmington, DE 19899-8705 (Courier 19801)

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	) Chapter 11
	)
W. R. GRACE & CO., et al. <sup>1</sup> ,	) Case No. 01-01139 (JKF)
	) (Jointly Administered)
	)
Debtors.	) <b>Re: Docket No. 9384</b>
	)
	) <b>Response Deadline: October 24, 2005 at 4:00 p.m.</b>
	) <b>Reply Deadline: October 31, 2005</b>
	) <b>Sur-Reply Deadline: November 4, 2005 at 4:00 p.m.</b>
	) <b>Hearing Date: November 14, 2005 at 12:00 p.m.</b>

**NOTICE OF FILING OF SUMMARY CHARTS IN SUPPORT OF DEBTORS'  
FIFTEENTH OMNIBUS OBJECTION (SUBSTANTIVE) TO ASBESTOS  
PROPERTY DAMAGE CLAIMS AND SETTING OF REVISED DATES**

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co. Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., GC Limited Partners I, Inc., (f/k/a Grace Cocoa Limited Partners I, Inc.), GC Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc. GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

**PLEASE TAKE NOTICE** that pursuant to the Court's Order of September 19, 2005 attached hereto as Exhibit A, on or about September 26, 2005, the above-captioned debtors and debtors in possession (the "Debtors") filed a Summary Chart attached hereto as Exhibit B in further support of the Debtors' Fifteenth Omnibus Objection (Substantive) to Asbestos Property Damage Claim (the "Fifteenth Omnibus Objection") (Docket #9315 filed September 1, 2005) which was previously served on you, with the United States Bankruptcy Court for the District of Delaware. This Summary Chart, as ordered by the Court, identifies the claimant, claim number, building and location (if known), counsel for the claimant (if known), and a specification of which exhibits to the 15th Omnibus Objection relate to each claim objected to.

**PLEASE TAKE FURTHER NOTICE** that the Debtors have also filed a chart to serve as a "Key" to the Summary Chart. The Key specifies the subject matter of each objection, by exhibit number. The Key is attached hereto as Exhibit C.

**PLEASE TAKE FURTHER NOTICE** that the Debtors, through The BMC Group ("BMC"), will serve copies of the Summary Chart and Key in searchable format on a compact disk and, where possible, e-mail the Summary Chart and Key along with this Notice on the following: (1) the Office of the United States Trustee; (2) each of the official committees in these Chapter 11 Cases<sup>2</sup>; (3) any attorney that represents a PD claimant in these Chapter 11 Cases as indicated on the Proofs of Claim; and (4) any PD claimant who is not represented by an attorney as indicated on the Proofs of Claim. Further, the Debtors will serve copies of the Notice (without the Summary Chart or Key) on all parties that have requested that they be served with all pleadings filed in these cases pursuant to Federal Rule of Bankruptcy Procedure 2002. Any party may obtain a copy of the Notice, the Summary Chart and/or Key, in searchable format, by

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<sup>2</sup> Capitalized terms used, but not defined herein, are defined in the Debtors' Fifteenth Omnibus Objection (Substantive) to Asbestos Property Damage Claims.

requesting the same from BMC at (888) 909-0100 or by going onto the BMC website at <http://www.bmccorp.net/wrgrace>.

**PLEASE TAKE FURTHER NOTICE** that

1. A hearing on the Fifteenth Omnibus Objection will be held before the Honorable Judith K. Fitzgerald, United States Bankruptcy Court, 824 Market Street, Wilmington, Delaware on **November 14, 2005 at 12:00 p.m.** (the "Claims Hearing"). A status hearing only with respect to the Fifteenth Omnibus Objection will be held before the same on October 24, 2005 at 12:00 p.m.

2. Any party wishing to oppose the relief requested in the Fifteenth Omnibus Objection must file a written response with the Clerk of the U.S. Bankruptcy Court, 824 Market Street, Wilmington, Delaware 198091, and serve a copy of the response upon Kirkland & Ellis LLP, Attn: Katherine Phillips, 200 East Randolph Drive, Suite 6500, Chicago, Illinois 60601, and upon Pachulski, Stang, Ziehl, Young, Jones & Weintraub P.C., Attn: James E. O'Neill, 919 N. Market Street, 16th Floor, P.O. Box 8705, Wilmington, Delaware 19899-8705 (Courier 19801), so as to be received on or before **October 24, 2005 at 4:00 p.m. (Eastern Time)**. Only those responses timely filed with the Court and received by the Debtors' counsel will be considered by the Court.

3. If no response is filed, served and received by October 24, 2005, at 4:00 p.m. (Eastern Time) the Court will be requested to enter an order, reclassifying, reducing or disallowing and expunging, the Claim(s) as requested in the Fifteenth Omnibus Objection.

4. Replies to the Responses may be filed and served on or before October 31, 2005. Surreplies may be filed and served on or before November 4, 2005 at 4:00 p.m. (Eastern Time). Late filings will not be considered. Each response, reply and surreply shall address **ONLY** the

matters not previously addressed and shall include all exhibits, affidavits and documents supporting the response/reply/surreply and shall include the caption, the claim number and claimant's name and building/location.

5. If you file a response/reply/surreply to the Fifteenth Omnibus Objection, you should be prepared to argue that response at the Claims Hearing unless you reach an agreement with the Debtors' counsel to continue or resolve your objection. The schedule for hearing the objections set out by the Debtors in the Fifteenth Omnibus Objection at pp. 5-9, has been superceded by the Court's Order of September 19, 2005, which sets all objections for a hearing to begin on November 14, 2005.

6. You need not respond to the Fifteenth Omnibus Objection or appear at the Claims Hearing if you do not object to the relief requested in the Fifteenth Omnibus Objection. If you do not timely file and serve a response to the Fifteenth Omnibus Objection, the relief requested in the Fifteenth Omnibus Objection may be granted without further notice to you. Failure to timely file a response to the Fifteenth Omnibus Objection shall be deemed (i) waiver of your right to respond to the Fifteenth Omnibus Objection and (ii) your consent to the relief requested in the Fifteenth Omnibus Objection respecting your Claim.

*[Remainder of Page Left Intentionally Blank]*

7. If you have any questions regarding your claim(s) you should contact BMC at (888) 909-0100. If you have any questions regarding the Fifteenth Omnibus Objection, the Summary Chart or the Chart, please call Katherine Phillips at Kirkland & Ellis LLP at (312) 649-3857.

Dated: September 26, 2005

KIRKLAND & ELLIS LLP  
David M. Bernick, PC  
Michelle Browdy  
Janet S. Baer  
200 East Randolph Drive  
Chicago, IL 60601  
Telephone: (312) 861-2000  
Facsimile: (312) 861-2200

-and-

PACHULSKI, STANG, ZIEHL, YOUNG, JONES  
& WEINTRAUB P.C.

  
\_\_\_\_\_  
Laura Davis Jones (Bar No. 2436)  
James E. O'Neill (Bar No. 4042)  
919 North Market Street, 16<sup>th</sup> Floor  
P.O. Box 8705  
Wilmington, DE 19899-8705 (Courier 19801)  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400

Co-Counsel for Debtors and Debtors in Possession